EXHIBIT 2

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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LEK SECURITIES CORPORATION and ROX SYSTEMS, INC.

Case No.: 19-CV-02142

(RMB/BCM)

Plaintiffs,

- against -

NICOLAS LOUIS, JONATHAN FOWLER, VOLANT HOLDING, LLC d/b/a VOLANT TRADING, VOLANT: TRADING, LLC, VOLANT LIQUIDITY, LLC, AND VOLANT EXECUTION, LLC

Defendants. :

PLAINTIFFS' PROPOSED SCHEDULING ORDER

On March 8, 2019, plaintiffs Lek Securities Corp. and ROX Systems, Inc. (together, "LSC/ROX" or "Plaintiffs") commenced this lawsuit by filing their complaint and moving, by Order to Show Cause, for a temporary restraining order, preliminary injunction, and expedited discovery. As part of their papers submitted in connection with the Order to Show Cause, Plaintiffs included proposed document requests, interrogatories, and notices of deposition ("Plaintiffs' Initial Discovery Requests"). On March 8, 2019, the Court signed the Order to Show Cause and granted the Plaintiffs' motion for a temporary restraining order ("TRO"). On March 7, 2019, Plaintiffs' Initial Discovery Requests were sent to both the individual defendants, Nicolas Louis ("Louis") and Jonathan Fowler ("Fowler") (together "Louis/Fowler" or the "Individual Defendants"), and the corporate defendants, Volant Holding, LLC d/b/a Volant Trading, Volant Trading, LLC, Volant Liquidity, LLC, and Volant Execution, LLC (referred to together as the "Volant Defendants"). Volant served their objections and responses to Plaintiffs' Initial Discovery Requests on March 13, 2019. ECF Nos. 19-2 and 19-3. The Individuals

Defendants served their objections and responses to Plaintiffs' Initial Discovery Requests on March 31, 2019.

During a status conference before Judge Berman on April 1, 2019, Judge Berman continued the TRO and instructed the parties to engage in and complete discovery so that the case could proceed directly to a trial on the merits. Court Tr. 3:19-20, 9:19-10:1. In light of Judge Berman's instructions, and consistent with the interests of judicial economy and efficiency, the parties are to comply with the following schedule unless otherwise ordered: (a) Defendants are to file their responsive pleadings by Friday, April 5, 2019; (b) Plaintiffs are to serve any supplemental discovery requests and Defendants are to serve any discovery requests by Monday, April 8, 2019; (c) Defendants are to serve their objections and responses to Plaintiffs' supplemental discovery requests, if any, and Plaintiffs are to serve their objections and responses to any discovery requests served by Defendants by Monday, April 15, 2019;¹ (d) on Monday, April 22, 2019, or on such other day and time to be scheduled by the Court, the Court shall conduct a telephonic hearing to resolve any outstanding disagreements between the parties with respect to discovery objections; (e) the parties are to produce all non-privileged documents responsive to any outstanding document requests, along with a privilege log, by Monday, April 29, 2019; (f) Plaintiffs shall take the Defendants' depositions from Monday, May 6 to Monday, May 13, 2019;² (g) Defendants shall take Plaintiffs' deposition(s), if any, from Tuesday, May 14 to Friday, May 17, 2019; and (h) expert disclosures under Fed. R. Civ. P. 26(a)(2), if any, shall

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¹ Defendants served their first set of document requests and interrogatories on Plaintiffs on April 2, 2019.

² On March 8, 2019, Plaintiffs served notices to take the depositions of Louis, Fowler, and each of the Volant Defendants. Based upon information gleaned from Defendants' opposition papers (ECF Nos. 18-26) and interrogatory responses, Plaintiffs also plan to depose, at a minimum, the following additional witnesses: (1) Brian Donnelly, founder and Chief Executive Officer of Volant Trading, LLC and (2) Wilbert Shin, Chief Operating Officer of Volant Liquidity, LLC, and Chief Operating Officer and Chief Compliance Officer of Volant Execution, LLC.

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be served by Friday, May 31, 2019, and any rebutt	al shall be served consistent with Fed. R. Civ.
P. 26(a)(2)(D).	
SO ORDERED:	
Dated:	
	United States Judge